

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LAUTHA V. ANDERSON, SR.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:17-CV-2659 AGF
)	
CHANTAY GODERT, et al.,)	
)	
Defendants.)	

**PLAINTIFF’S PRE-TRIAL PROPOSED LIST OF RESPONSES TO
REQUESTS FOR ADMISSIONS**

COMES NOW Plaintiff Lautha V. Anderson, Sr. (“Plaintiff”), by and through his attorney James W. Schottel, Jr., and hereby states that he intends to read interrogatory answers to the jury:

Plaintiff proposes to read the following responses to requests for admissions of Defendant Monica Rubino:

Response to Request No. 2:

“That on or about November 18, 2016, at Plaintiff Lautha V. Anderson, Sr.’s cell door in Administrative Segregation Unit at Northeast Correctional Center you told Plaintiff Lautha V. Anderson, Sr. that he had to leave his cell in the administrative segregation unit and go to the General Population.

RESPONSE: Admitted.”

Response to Request No. 3:

“That on November 18, 2016, after telling Plaintiff Lautha V. Anderson, Sr. that he had to go to General Population, you told Plaintiff Lautha V. Anderson, Sr. that if he did not go he would receive a conduct a violation report and physical force would be used against him to take him to General Population for disobeying a direct order.

RESPONSE: Admitted that I told him he would receive a conduct violation. Denied that I said that physical force would be used against him.”

Plaintiff proposes to read the following responses to requests for admissions of Defendant Jeremy Hansen:

Response to Request No. 2:

“That on or about November 18, 2016, you participated in removing Plaintiff Lautha V. Anderson, Sr. from the Administrative Segregation Unit at Northeast Correctional Center and transporting Plaintiff Lautha V. Anderson, Sr. to General Population.

RESPONSE: Admitted only to the extent that I was on the committee that determined that Plaintiff should be moved to general population. Denied as to the remaining parts of the request.”

Plaintiff proposes to read the following responses to requests for admissions of Defendant Taylor Preston:

Response to Request No. 2:

“That on or about November 18, 2016, you participated in removing Plaintiff Lautha V. Anderson, Sr. from the. Administrative Segregation Unit at Northeast Correctional Center and transporting Plaintiff Lautha V. Anderson, Sr. to General Population.

RESPONSE: Admitted that I was on the committee that assigned Plaintiff to go to General Population. Denied a s to the remaining portions of the request.”

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

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Attorney for Plaintiff
Lautha V. Anderson, Sr.

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2020, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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s/James W. Schottel, Jr.